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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	: Chapter 11
LIGHTSQUARED INC., <i>et al.</i> ,	: Case No. 12-12080 (SCC)
Debtors.	: Jointly Administered
	: Adv. Proc. No. 13-01390 (SCC)
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LIGHTSQUARED LP, LIGHTSQUARED INC.,	:
LIGHTSQUARED INVESTORS HOLDINGS INC., TMI	:
COMMUNICATIONS DELAWARE LIMITED	:
PARTNERSHIP, LIGHTSQUARED GP INC., ATC	:
TECHNOLOGIES, LLC, LIGHTSQUARED CORP.,	:
LIGHTSQUARED INC. OF VIRGINIA,	:
LIGHTSQUARED SUBSIDIARY LLC, SKYTERRA	:
HOLDINGS (CANADA) INC., AND SKYTERRA	:
(CANADA) INC.,	:
Plaintiffs-Intervenors,	:
- against -	:
SP SPECIAL OPPORTUNITIES LLC, DISH NETWORK	:
CORPORATION, ECHOSTAR CORPORATION, AND	:
CHARLES ERGEN,	:
Defendants.	:
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**DECLARATION OF BRIAN D. GLUECKSTEIN IN SUPPORT OF
DISH NETWORK CORPORATION AND ECHOSTAR CORPORATION'S
OPPOSITION TO PLAINTIFFS' MOTION FOR SANCTIONS**

BRIAN D. GLUECKSTEIN, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. I am a member of the Bar of the State of New York and a member of Sullivan & Cromwell LLP, counsel to Defendants DISH Network Corporation and EchoStar Corporation in the above-captioned matter. I am also a member of the Bar of the U.S. District Court for the Southern District of New York.

2. I respectfully submit this Declaration to place before the Court certain materials referenced in *DISH Network Corporation and EchoStar Corporation's Opposition to Plaintiffs' Motion for Sanctions*.

3. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' First Requests for the Production of Documents, dated August 22, 2013.

4. Attached hereto as Exhibit B is a true and correct copy of DISH Network Corporation, EchoStar Corporation, and L-Band Acquisition Corporation's Responses and Objections to Plaintiffs' First Request for the Production of Documents, dated September 9, 2013.

5. Attached hereto as Exhibit C is a true and correct copy of an email chain including an email from Rebecca Hagenson to Brian Glueckstein, dated September 27, 2013.

6. Attached hereto as Exhibit D is a true and correct copy of a letter from Jed Bergman to the Honorable Shelley C. Chapman (with attachments), dated October 10, 2013.

7. Attached hereto as Exhibit E is a true and correct copy of DISH Network Corporation, EchoStar Corporation and L-Band Acquisition Corporation's Responses and Objections to Plaintiffs' Second Requests for the Production of Documents, dated October 11, 2013.

8. Attached hereto as Exhibit F is a true and correct copy of a letter from Christine Montenegro to Gregory Markel, dated October 21, 2013.

9. Attached hereto as Exhibit G is a true and correct copy of a letter from Brian Glueckstein to Christine Montenegro, dated October 22, 2013.

10. Attached hereto as Exhibit H is a true and correct copy of a letter from Alan Stone to the Honorable Shelley C. Chapman (with exhibits), dated November 27, 2013.

11. Attached hereto as Exhibit I is a true and correct copy of a letter from Brian Glueckstein to the Honorable Shelley C. Chapman, dated November 29, 2013.

12. Attached hereto as Exhibit J is a true and correct copy of a letter from Alan Stone to Rachel Strickland and Brian Glueckstein, dated March 8, 2014.

13. Attached hereto as Exhibit K is a true and correct copy of a letter from Brian Frawley to Alan Stone, dated March 9, 2014.

14. Attached hereto as Exhibit L is a true and correct copy of the transcript of the proceedings in this Court on December 2, 2013.

15. Attached hereto as Exhibit M is a true and correct copy of the transcript of the proceedings in this Court on February 4, 2014.

16. Attached hereto as Exhibit N is a true and correct copy of the transcript of the proceedings in this Court on February 28, 2014.

17. Attached hereto as Exhibit O is a true and correct copy of an excerpt from the transcript of the proceedings in this Court on March 17, 2014.

18. Attached hereto as Exhibit P is a true and correct copy of the transcript of the deposition of Thomas A. Cullen, dated March 4, 2014.

19. Attached hereto as Exhibit Q is a true and correct copy of the transcript of the deposition of Mariam Sorond, dated March 4, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 1, 2014
New York, New York

/s/ Brian D. Glueckstein

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